

**UNITED STATES DISTRICT COURT**  
for the  
**Middle District of Tennessee**  
at Columbia

**RECEIVED**

**AUG 28 2024**

US DISTRICT COURT  
MID DIST TENN

**Carlos Farris,**

**Plaintiff,**

**v.**

**Case No.: 1:23-CV-00024-WLC-BDH**

**David Baker, Adam Boron, F/N/U Kacy,  
Lt. F/N/U Harris, Lt. F/N/U Maddox,  
F/N/U Scott, Trinity Food Services,**

**Defendants.**

**PLAINTIFF'S RESPONSE AND ANSWER TO THE DEFENDANTS  
INTERROGATORIES**

1. Carlos M. Farris
2. David Baker, Adam Boron, F/N/U Kacy,  
Lt. F/N/U Harris, Lt. F/N/U Maddox,  
F/N/U Scott, Trinity Food Services, but other than these names I was not privileged to  
other inmate names that where there during my incarceration at maury county jail nor  
there address so I am not able to subpoena other witnesses on my behalf.this is due to the  
privacy act policy at maury county jail.
3. I can not answer this question due to the fact as a inmate I was not privileged to the  
personnel information of the staff members nor the names of each physician , or nurse  
practitioner, nor the hospital ,or clinic , including mental health practitioners or there there  
jail medical personnel who treated me during the time of this complaint but I have

submitted a motion to the defendants to acquire them .

4. .Dates of my arrest 2022 -2024

.Maury County TN 38401

.case # 2022cr30062 & 2019cr27612

.I was sentenced to (1) One year sentences on P.O.V And One years convective for new charges

5. Itemize all damages in the claim -

I suffered wantonness of 24 hour hunger pains.

I suffered being Mental Anguish.

I suffered retaliation and daily fear of retaliation .

I suffered neglect-the gave little or no regard to my religion or to the fact that I was denied food due being unable to eat what was served because of my religious diet.

I suffered Cruel and unusual punishment.

6.NO

7.NO

8. As a inmate at Maury county jail/ sheriffs department I was not privileged to staff's personnel, information . Including any physician ,or nurse practitioner, or physician's assistant, psychiatrist, and psychologist,that provided services to me during over the time period of (10) years .

9. The Gnostic Temple Of Truth, The House Of Yahweh, and The study of Ancient Gnosticism Via . The chapel of Ben Yahweh, Gnosis Of The Hidden Truth

10. C.o f/n/u Booker I call as a eye witness on my behalf. As to the facts of the case of my religion and to the fact I was repeatedly denied my religious rites for worship and

religious dietary trays .

Joshua Covell to the facts that he also was an eye witness to the days and times when the defendants did the things in my complaint.

Respectfully submitted,



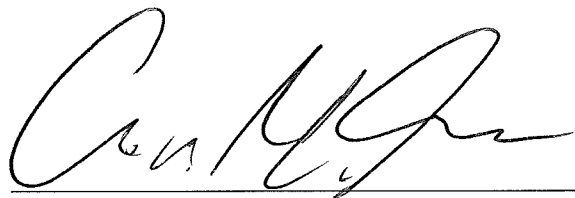
Carlos M. Farris, #391233  
2520 Union Springs Rd.  
Whiteville, TN 38075

#### **Certificate of Service**

I, Carlos Farris, swear under penalty of perjury, that a true and exact copy of the foregoing was placed inside the outgoing mailbox at Hardeman County Correctional Facility, to be logged and mailed, via U.S. Mail, with sufficient postage for First-Class, on this 13<sup>th</sup> day of August, 2024, to:

Robyn Beale Williams  
12 Cadillac Drive  
Suite 480  
Brentwood, TN 37027; and

Alexander B. Chosid  
1260 Andes Boulevard  
St. Louis, MO 63132.



Carlos Farris

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FIRST-CLASS



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Carlos Farris  
I/M# 00391233  
HCCF/Unit-L/Pod-D/Cell-106  
2520 Union Springs Road  
Whiteville, TN 39075

Court Clerk  
United States District Court  
Middle District of Tennessee

719 Church Street  
Suite 1300  
Nashville, TN 37203

**LEGAL MAIL**

